

In The Matter Of:
Caitlin O'Connor v.
The Lampo Group, LLC a/k/a Ramsey Solutions

Video Deposition of Caitlin O'Connor
June 22, 2021

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Original File 2021-06-22 Caitlin OConnor.txt

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Video Deposition of Caitlin O'Connor - June 22, 2021

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

CAITLIN O'CONNOR,)	
)	
Plaintiff,)	
)	No. 3:20-CV-00628
v.)	JUDGE RICHARDSON
)	
THE LAMPO GROUP, LLC a/k/a)	MAGISTRATE JUDGE
RAMSEY SOLUTIONS,)	FRENSLEY
)	
Defendant.)	JURY DEMAND

VIDEO DEPOSITION OF

CAITLIN O'CONNOR

Tuesday, June 22, 2021

1 baby?

2 A. I guess that's an open-ended question. Yes
3 and no.

4 Q. Okay. What do you mean by -- what do you
5 mean by that?

6 A. There was nothing -- we weren't preventing a
7 pregnancy.

8 Q. Did you ever speak to anyone at Ramsey
9 and -- and ask for an exception to the righteous living
10 val -- core value? Did you ever ask for an exception?

11 A. No.

12 Q. Did you ever tell anyone at Ramsey that you
13 were engaged in premarital sex and asked if that was a
14 violation of a rule?

15 A. No.

16 Q. All right. I'm going to show you -- and I
17 apologize. I thought I had copies of this, but I
18 don't. So I'm just going to show it you, and
19 Ms. Collins can look over your shoulder there. This is
20 the -- I believe it's a mission statement. This was in
21 your personnel file. Is that something that you
22 drafted, Ms. O'Connor?

23 A. I believe so.

24 Q. Okay. And this is something that was in
25 your personnel file, but it looks like you kept a copy

1 Q. Okay. And is that an accurate description
2 of your religious belief?

3 A. Yes.

4 Q. And was that an accurate description of your
5 religious belief at the time of your employment?

6 A. Yes.

7 Q. Did you ever express this religious belief
8 to anyone at Ramsey?

9 A. Yes.

10 Q. Okay. Who did you express that to?

11 A. I mean, I worked there for four years.
12 There was a lot that, you know, I didn't agree with. I
13 don't believe that -- I don't believe that being gay is
14 a sin. I don't believe being transgender is a sin. I
15 don't believe that if you're Muslim or atheist or
16 agnostic that I'm any better than you or that I'm right
17 or you're wrong.

18 Q. What about premarital sex? Do you think
19 that that's a sin?

20 A. No.

21 Q. Did you tell anyone at Ramsey that you
22 thought premarital sex was not a sin?

23 A. I'm sure I did, yeah.

24 Q. Do you recall who --

25 A. I don't.

1 Q. -- who you told? You do not?

2 A. I do not.

3 Q. Do you recall telling anyone in leadership
4 at Ramsey that you did not believe premarital sex was a
5 sin?

6 A. No.

7 Q. This description of your religious belief.
8 It appears to me from reading that that your religious
9 belief is Christianity; is that right?

10 A. Correct.

11 Q. Okay. And then is there any part of your
12 religious belief that either requires or encourages you
13 to engage in premarital sex?

14 A. Could you restate that question?

15 Q. Sure. Is there any part of your religious
16 belief that requires you -- we'll start with that -- to
17 engage in premarital sex? Is it a requirement of your
18 faith?

19 A. No.

20 Q. Does it encourage you to engage in
21 premarital sex?

22 A. I -- I guess I don't understand that
23 question.

24 Q. Sure. In various religious beliefs and
25 faiths, certain practices are encouraged and certain

1 practices are discouraged. That's a pretty common
2 theme through religion. In your view of Christianity,
3 are you encouraged to engage in premarital sex?

4 A. I think that I'm able to make any choice
5 about -- I don't know. I guess that sounds -- I
6 don't -- I'm not understanding like exactly what -- are
7 you -- well, I'm not even going to speculate. I
8 don't --

9 Q. Sure.

10 A. -- understand the exact question --

11 Q. Okay. Let's --

12 A. -- that you're asking.

13 Q. Okay. Let's do the inverse because that
14 might make -- maybe that would be more understandable.
15 Does anything about your religious belief discourage
16 you from having premarital sex?

17 A. No.

18 Q. Are you encouraged or rewarded if you have
19 premarital sex?

20 A. By whom?

21 Q. God, your faith, your church?

22 A. Am I -- could you state that again?

23 Q. Sure. Does your church or your faith or
24 your God, does that -- does any of those things
25 actually reward you or encourage you to engage in

1 premarital sex?

2 A. I don't -- I don't think that God cares what
3 you're doing in your bedroom, if that's a way to answer
4 it.

5 Q. So then is the answer, no, it is not
6 discouraged, or, no, it is not encouraged?

7 A. It's neither.

8 Q. Okay. If a company prohibits premarital
9 sex, does that violate your religious belief?

10 A. Yes.

11 Q. How does that violate your religious belief?

12 A. They're imposing their religious beliefs by
13 stating that they have -- they have a religious belief
14 that you can't do a behavior. So the same would be
15 true for somebody who disagrees. That's their
16 sincerely-held belief. That -- so, yes, I -- I would
17 be discriminating against them, and they would be
18 discriminating against me. Both things could be true.

19 Q. Okay. I am going to show you several
20 documents that were obtained from the Equal Employment
21 Opportunity Commission. I told you we would get back
22 to the EEOC, so we're going to do that. And I am going
23 to show you a series of documents, and I just want to
24 see if you have seen them.

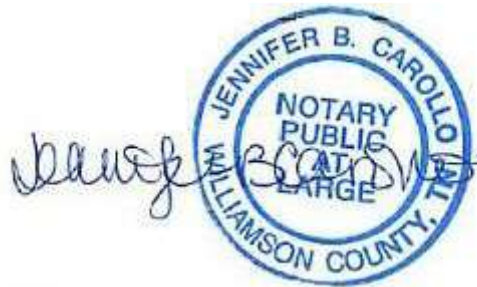
25 A. Uh-huh.

REPORTER'S CERTIFICATE

I, Jennifer B. Carollo, Licensed Court Reporter, Registered Professional Reporter, Certified Court Reporter, and Notary Public for the State of Tennessee, hereby certify that I reported the foregoing proceedings at the time and place set forth in the caption thereof; that the proceedings were stenographically reported by me; and that the foregoing proceedings constitute a true and correct transcript of said proceedings to the best of my ability.

I FURTHER CERTIFY that I am not related to any of the parties named herein, nor their counsel, and have no interest, financial or otherwise, in the outcome or events of this action.

IN WITNESS WHEREOF, I have hereunto affixed my official signature and seal of office this 24th day of June, 2021.



JENNIFER B. CAROLLO, LCR, RPR, CCR
AND NOTARY PUBLIC FOR THE STATE
OF TENNESSEE

LCR No. 432, Expires 6/30/2022

Notary Commission Expires 6/26/2024

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